



Andrew F. Alber  
550 E. Swedesford Road, Suite 270  
Wayne, Pennsylvania 19086  
Andrew.Albero@lewisbrisbois.com  
Direct: 215.977.4051

May 2, 2022

**VIA ECF**

The Honorable Robert B. Kugler  
United States District Court Judge  
District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Room 1050  
Camden, NJ 08101

Special Master the Honorable Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East Tower  
18th Floor  
Philadelphia, PA 19103

**Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**  
**Case No. 1:19-md-02875-RBK-JS**  
**(*Michael Garrison v. Camber Pharmaceuticals, et al.*, Docket No.: 1:20-cv-15720-RBK-SAK)**

Dear Judge Kugler and Special Master Vanaskie:

We represent Defendant, Camber Pharmaceuticals, Inc., in the above referenced litigation. Please accept this letter as a request to deny or otherwise strike the procedurally defective and premature “Motion for Summary Judgment” filed by the *pro se* losartan personal injury Plaintiff, Michael Garrison, on April 20, 2022. In the alternative, pursuant to Local Civil Rule 7.1(d)(5), please accept this letter as an initial request for an extension to respond to Mr. Garrison’s “Motion for Summary Judgment,” which is set to be heard on the next motion date of May 16, 2022. Counsel for Defendant Walmart joins in this request.

This is a losartan personal injury matter originally filed in the USDC for the Eastern District of Michigan (Case No. 5:19-cv-12536-JEL-EAS). This matter was transferred to MDL No. 2875 on or about November 10, 2020. Pursuant to MDL Case Management Order (“CMO”) 23 at ¶2 “[n]o

Page 2

summary judgment motions may be filed without leave of court.” Without obtaining leave of court pursuant to CMO No. 23, and without filing a short form complaint as required under CMO 24, *pro se* Plaintiff filed an unsigned document entitled “Motion for Summary Judgment,” on April 20, 2022. The filing is premature and not in compliance with Local Civil Rules 7.1 and 56.1. The court should deny or otherwise strike Plaintiff’s improper filing.

However, if the court requires a formal response to Plaintiff’s improper filing, Defendants request that the motion be deferred to the next motion date of June 6, 2022, with Defendants’ Opposition due on May 23, 2022. We appreciate the Court’s time and attention to this matter.

Respectfully,

*/s/ Andrew F. Albero*

Andrew F. Albero for  
LEWIS BRISBOIS BISGAARD & SMITH LLP

cc: *Pro Se* Plaintiff, Michael Garrison, via Regular Mail  
David Sellinger, Esquire (counsel for Walmart)